

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

Dallas Division

2013 JUN 19 PM 3:42

DEPUTY CLERK

NT

Burton, Ilorna Cosette

Plaintiff

**3-13CV2326-M**

v.

Prime Healthcare Management, Inc. , Dallas Medical Center

Defendant

Civil Action No.

**COMPLAINT**

Plaintiff: Ilorna Cosette Burton  
P.O.Box 851925  
Mesquite, Texas 75185  
Phone 214 870-1812

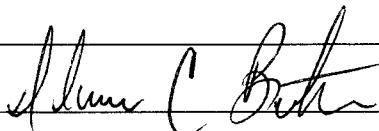
Defendant: Prime Healthcare Mgmt, Inc., Dallas Medical Center  
San Bernardino, CA 7 Medical Parkway  
Dallas, Texas 75234

Dallas Medical Center retaliation against me Ilorna Cosette Burton culminated being termination. I believe the conduct of Dallas Medical Center in direct violation of Title VI I of Civil Right ACT of 1964~7, 45U.S.C.~2000e (1964). My legal injuries I claim to have suffered: back pay, future lost wages, punitive and compensatory damages. I have suffered he humiliation, libel slander, assault, and stress from Phil Cortopassi, Amy Parker- Ferguson, and Marvin Blake. Also I have suffered with pain to my left shoulder after the physical assault by Marvin Blake. I'm asking the court to grant restitution in my case if I prevail. Thank you.

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Date 6/19/2013

Signature Ilorna Cosette Burton



Print Name Ilorna Cosette Burton

Address P.O. Box 851925

City, State, Zip Mesquite, Texas 75185

Telephone 214 870-1812

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

Ilorna Burton

## DEFENDANTS

Prime Healthcare Management, Inc., Dallas Medical Center

(b) County of Residence of First Listed Plaintiff Dallas, Texas  
(EXCEPT IN U.S. PLAINTIFF CASES)

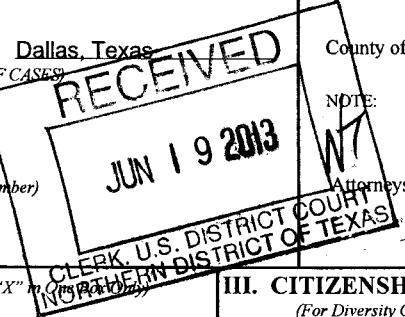
County of Residence of First Listed Defendant Dallas, Texas

(IN U.S. PLAINTIFF CASES ONLY)

IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)

Attorneys (If Known)



3-13CV2326-M

## II. BASIS OF JURISDICTION

(Place an "X" in One Box Only)

1 U.S. Government Plaintiff  3 Federal Question (U.S. Government Not a Party)

2 U.S. Government Defendant  4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES

(For Diversity Cases Only)

|   | PTF                        | DEF                        | PTF   | DEF  |
|---|----------------------------|----------------------------|---|--|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 <input type="checkbox"/> 5            |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 <input type="checkbox"/> 6            |

## IV. NATURE OF SUIT

(Place an "X" in One Box Only)

| CONTRACT  | TORTS   | FORFEITURE/PENALTY   | BANKRUPTCY   | OTHER STATUTES  |
|---|---|--|--|---|
| <input type="checkbox"/> 110 Insurance  | <b>PERSONAL INJURY</b>  | <b>PERSONAL INJURY</b>   | <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 | <input type="checkbox"/> 375 False Claims Act   |
| <input type="checkbox"/> 120 Marine   | <input type="checkbox"/> 310 Airplane                           | <input type="checkbox"/> 365 Personal Injury - Product Liability                           | <input type="checkbox"/> 422 Appeal 28 USC 158                           | <input type="checkbox"/> 400 State Reapportionment  |
| <input type="checkbox"/> 130 Miller Act   | <input type="checkbox"/> 315 Airplane Product Liability         | <input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability | <input type="checkbox"/> 423 Withdrawal 28 USC 157                       | <input type="checkbox"/> 410 Antitrust  |
| <input type="checkbox"/> 140 Negotiable Instrument                                | <input type="checkbox"/> 320 Assault, Libel & Slander           | <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability                    | <b>PROPERTY RIGHTS</b>   | <input type="checkbox"/> 430 Banks and Banking  |
| <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment    | <input type="checkbox"/> 330 Federal Employers' Liability       |  | <input type="checkbox"/> 820 Copyrights                                  | <input type="checkbox"/> 450 Commerce   |
| <input type="checkbox"/> 151 Medicare Act   | <input type="checkbox"/> 340 Marine                             |  | <input type="checkbox"/> 830 Patent                                      | <input type="checkbox"/> 460 Deportation  |
| <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) | <input type="checkbox"/> 345 Marine Product Liability           |  | <input type="checkbox"/> 840 Trademark                                   | <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations                   |
| <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits        | <input type="checkbox"/> 350 Motor Vehicle                      | <b>PERSONAL PROPERTY</b>   | <b>SOCIAL SECURITY</b>   | <input type="checkbox"/> 480 Consumer Credit  |
| <input type="checkbox"/> 160 Stockholders' Suits                                  | <input type="checkbox"/> 355 Motor Vehicle Product Liability    | <input type="checkbox"/> 370 Other Fraud Act   | <input type="checkbox"/> 861 HIA (1395ff)                                | <input type="checkbox"/> 490 Cable/Sat TV   |
| <input type="checkbox"/> 190 Other Contract                                       | <input type="checkbox"/> 360 Other Personal Injury              | <input type="checkbox"/> 371 Truth in Lending  | <input type="checkbox"/> 862 Black Lung (923)                            | <input type="checkbox"/> 850 Securities/Commodities/ Exchange                                 |
| <input type="checkbox"/> 195 Contract Product Liability                           | <input type="checkbox"/> 362 Personal Injury - Med. Malpractice | <input type="checkbox"/> 380 Other Personal Property Damage                                | <input type="checkbox"/> 863 DIWC/DIWW (405(g))                          | <input type="checkbox"/> 890 Other Statutory Actions  |
| <input type="checkbox"/> 196 Franchise  |   | <input type="checkbox"/> 385 Property Damage Product Liability                             | <input type="checkbox"/> 864 SSID Title XVI                              | <input type="checkbox"/> 891 Agricultural Acts  |
| <b>REAL PROPERTY</b>  | <b>CIVIL RIGHTS</b>   | <b>PRISONER PETITIONS</b>  | <input type="checkbox"/> 865 RSI (405(g))                                | <input type="checkbox"/> 893 Environmental Matters  |
| <input type="checkbox"/> 210 Land Condemnation                                    | <input type="checkbox"/> 440 Other Civil Rights                 | <input type="checkbox"/> 510 Motions to Vacate Sentence                                    | <b>FEDERAL TAX SUITS</b>   | <input type="checkbox"/> 895 Freedom of Information Act                                       |
| <input type="checkbox"/> 220 Foreclosure  | <input type="checkbox"/> 441 Voting                             | <b>Habeas Corpus:</b>  | <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)         | <input type="checkbox"/> 896 Arbitration  |
| <input type="checkbox"/> 230 Rent Lease & Ejectment                               | <input checked="" type="checkbox"/> 442 Employment              | <input type="checkbox"/> 530 General   | <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609                 | <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision |
| <input type="checkbox"/> 240 Torts to Land  | <input type="checkbox"/> 443 Housing/ Accommodations            | <input type="checkbox"/> 535 Death Penalty   |  | <input type="checkbox"/> 950 Constitutionality of State Statutes                              |
| <input type="checkbox"/> 245 Tort Product Liability                               | <input type="checkbox"/> 445 Amer. w/Disabilities - Employment  | <input type="checkbox"/> 540 Mandamus & Other  |  |   |
| <input type="checkbox"/> 290 All Other Real Property                              | <input type="checkbox"/> 446 Amer. w/Disabilities - Other       | <input type="checkbox"/> 550 Civil Rights  |  |   |
|   | <input type="checkbox"/> 448 Education                          | <input type="checkbox"/> 555 Prison Condition  |  |   |
|   |   | <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement                    |  |   |
|   |   | <input type="checkbox"/> 465 Other Immigration Actions                                     |  |   |

## V. ORIGIN

(Place an "X" in One Box Only)

1 Original Proceeding  2 Removed from State Court  3 Remanded from Appellate Court  4 Reinstated or Reopened  5 Transferred from another district (specify)  6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
**Civil Rights Act of 1964-7, 42 U.S.C. ~ 2000e et (1964)**

Brief description of cause:

Discrimination &amp; retaliation base on sex, race, color, age, &amp; disability

VII. REQUESTED IN COMPLAINT:  CHECK IF THIS IS A CLASS ACTION **DEMAND \$** **CHECK YES only if demanded in complaint:**  
UNDER F.R.C.P. 23 **JURY DEMAND:**  Yes  No

VIII. RELATED CASE(S)  
PENDING OR CLOSED: *(See instructions):* **JUDGE** **DOCKET NUMBER**

DATE SIGNATURE OF ATTORNEY OF RECORD  
06/19/2013 Ilorna Cosette Burton

FOR OFFICE USE ONLY

RECEIPT # **AMOUNT** **APPLYING IFFP** **JUDGE** **MAG. JUDGE**